

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DAVID SIDOO et al.,

Defendants.

No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S MOTION FOR LEAVE TO FILE  
REPLY BRIEF IN SUPPORT OF HIS RENEWED MOTION TO COMPEL  
THE PRODUCTION OF EXCULPATORY EVIDENCE**

Defendant John Wilson hereby moves for leave to file a four-page reply brief in support of his Renewed Motion to Compel the Production of Exculpatory Evidence (ECF No. 1227). Wilson submits that the concise brief he seeks to file, a copy of which is attached, is necessary for him to address the arguments in the government's Opposition (ECF No. 1270) and to present the issues adequately for the Court's consideration. The government has informed Wilson's counsel that it takes no position on this request.

Respectfully submitted,

John Wilson,

By his Counsel,

/s/ Michael Kendall

Michael Kendall (BBO # 544866)  
Yakov Malkiel (BBO # 689137)  
WHITE & CASE LLP  
75 State Street  
Boston, MA 02109-1814  
Telephone: (617) 979-9310  
michael.kendall@whitecase.com  
yakov.malkiel@whitecase.com

Andrew E. Tomback (pro hac vice)  
WHITE & CASE LLP  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8428  
andrew.tomback@whitecase.com

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1**

I hereby certify that, before filing this motion, defense counsel attempted in good faith to confer with the government to resolve or narrow the issues.

/s/ Michael Kendall  
Michael Kendall

**CERTIFICATE OF SERVICE**

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall  
Michael Kendall